



HC2 Broadcasting Holdings Inc.
450 Park Avenue, 30th Floor
New York, New York 10022
(212) 339-5800

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

October 25, 2018

Re: **LPTV, TV Translator, and FM Broadcast Station Reimbursement
MB Docket No. 18-214
Notice of Oral Ex Parte Presentation**

Dear Ms. Dortch:

On October 23, 2018, representatives of HC2 Broadcasting Holdings Inc. (“HC2”) Rebecca Hanson, EVP and General Counsel, and Louis Libin, Managing Director, along with counsel Paul Cicelski of Lerman Senter, PLLC, met with Jean Kiddoo, Hillary DeNigro, and Charles Eberle of the Incentive Auction Task Force, and Barbara Kreisman, Pamela Gallant, Maria Mullarkey, and Evan Morris of the Media Bureau.

The purpose of the meeting was to discuss the aforementioned proceeding, specifically operational requirements for eligibility and the need to avoid overly burdensome and/or duplicative evidentiary support related thereto, especially in the case of newly acquired stations. We also expressed concern that modifications to the 399 process might unintentionally increase an applicant’s soft costs in seeking reimbursement, to the extent that consultants already familiar with the process would have to relearn it. This would be a counterproductive outcome, especially in light of the FCC’s proposal to prioritize the reimbursement of hard costs over soft costs.

This letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,

/s/ Rebecca Hanson
EVP and General Counsel
HC2 Broadcasting Holdings Inc.
450 Park Avenue, 30th Floor
New York, NY 10022

cc: Jean Kiddoo Barbara Kreisman
Hillary DeNigro Pamela Gallant
Charles Eberle Maria Mullarkey
Evan Morris